

Message

**From:** Little, Brandi [BLittle@adem.alabama.gov]  
**Sent:** 7/31/2017 9:52:19 PM  
**To:** Pena-Molina, Ana [pena-molina.ana@epa.gov]  
**Subject:** RE: ORCR Summer Interns Project Regarding OB/OD Sites-Alabama

Hello, Ana! I am the project manager for Fort McClellan and Pelham Range and I have gotten as many answers to your questions as I could in such a short timeframe. Please scroll down to your questions to find my answers. Hope this helps!

Thanks!

Brandi

*Brandi Little*

Brandi Little  
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**From:** Pena-Molina, Ana [mailto:pena-molina.ana@epa.gov]  
**Sent:** Wednesday, July 26, 2017 2:03 PM  
**To:** Strickland, Chrystal <CStrickland@adem.alabama.gov>  
**Cc:** Kuziomko, Joseph <kuziomko.joseph@epa.gov>; Kohler, Amanda <Kohler.Amanda@epa.gov>; Shuster, Kenneth <Shuster.Kenneth@epa.gov>; Housley, Denise <Housley.Denise@epa.gov>; Crosby-Vega, Terri <Crosby-Vega.Terri@epa.gov>; Newman, Alan <Newman.Alan@epa.gov>; McKeePerez, Nancy <McKeePerez.Nancy@epa.gov>; Danois, Héctor <Danois.Hector@epa.gov>; Gilliland, Houston <Gilliland.Houston@epa.gov>; Watson, Sarah <Watson.Sarah@epa.gov>; Greaney, Kevin <greaney.kevin@epa.gov>; Singh, Harbhajan <Singh.Harbhajan@epa.gov>  
**Subject:** ORCR Summer Interns Project Regarding OB/OD Sites-Alabama

I am writing to seek information on the closure status of the Open Burn/Open Detonation (OB/OD) units listed below to assist ORCR in a new project to assess closure of OB/OD units. With this information, EPA will be able to identify, evaluate, and document procedures, techniques, and criteria to assess, clean up, and close OB/OD units/sites in a standardized manner.

EPA has been documenting soil and ground water contamination from OB/OD units and the costs to clean them up. Given the inordinate extent of contamination and costs of clean-up that have been reported, we are now seeking to learn more about the monitoring, clean-up procedures, successes, and costs of these efforts. There is currently no national guidance on procedures to assess, monitor, and clean up OB/OD sites, nor metrics to achieve clean closure of OB/OD units. We are requesting information on the clean closure (CC) of OB/OD sites to assist us.

Please first verify the following codes for your appropriate facilities in Alabama.

**Alabama**

FACILITY_ID	FACILITY_NAME	UNIT_NAME	UNITs	UNIT_DETAIL_SEQ	legal status	operating status	EFFECTIVE_DATE
AL8213700000	US ARMY GARRISON FT MCCLELLAN PELHAM RAN	OB/OD	1	2	IS	CC	20020930

ALR000008649	HINDMAN SALVAGE & RECYCLING	WIRE BURN AREA	1	2	NN	CC	20131022
AL3210020027	ANNISTON ARMY DEPOT	OB2	33	1	IS	IN	19881107
AL3210020027	ANNISTON ARMY DEPOT	OB2	33	1	IS	IN	19881107

### Questions:

We have a number of questions we hope you can answer regarding your clean closed/closing sites. The operating status of the facilities will determine which sets of questions are to be answered. We understand that some of this data may be difficult to find but we would really appreciate if you could dig it up for us as it will help us move forward with this project and eventually help EPA update OB/OD closing procedures.

### Clean Closed (CC) Facilities' questions:

1. Did these sites complete clean closure or are they still in the process of seeking to clean close? Yes – clean closed in 2002
2. Did the state officially certify/approve the unit(s) Clean Closed (CC)? Yes – ADEM approved the clean closure on 9/30/2002
3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation? Operated from 1983-1996; closed due to small quantities of munitions being treated – wasn't economical; max quantity treated per permit parameters would be 1440 lb NEW by OD and 6480 lb NEW by OB for total years of operation
4. Was it OB or OD or both? Both
5. What sampling procedures were used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)? They inspected the area after each use to ensure untreated military munitions did not kick out; conducted surface soil, subsurface soil, sediment, surface water and groundwater sampling to exhibit clean closure; surface and subsurface soils were field screened; 9 monitoring wells were installed; EOD performed surface sweeps of each area including holes with surface magnetometers
6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)? No structures, buildings or equipment were associated with this unit
7. What clean-up procedures and techniques were used to clean up the contaminants (e.g., excavation, soil sifting)? No contamination was noted during confirmation sampling; during OB/OD activities, they only OB/OD solids; they would place it on the ground, prime and detonate or would place in a 55 gal drum, demo pit, trench or ground and then pour fuel over it and burn it; if needed, it would be
8. What data was recorded and metrics used to evaluate the extent and levels of contamination? Mean, 2 times mean, upper background range, 95% upper confidence level
9. What criteria was used to certify clean closure (e.g., EPA action levels)? Site-specific screening levels and background levels
10. What was the total cost to achieve Clean Closed (CC) status? Unknown

### Inactive/Closing, but Not Yet RCRA Closed (IN) and Corrective Action and Superfund (CA, SF) Facilities' questions:

1. Are these units seeking to clean close?
2. If so, what criteria is being used to attempt clean closure (e.g., EPA action levels)?
3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation?
4. Was it OB or OD or both?

5. What sampling procedures are being used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)?
6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
7. What clean-up procedures and techniques are being used to clean up the contaminants (e.g., excavation, soil sifting)?
8. What data is being recorded and metrics being used to evaluate the extent and levels of contamination?
9. What is the total cost to date to remediate the site?

We plan to have a contractor gather this information on a select number of sites from the states. The purpose of this current effort is to gather information on the status of cleanup at these sites to help us identify which sites have the best information for our contractor to follow up with. Thus, for this effort, we seek answers to questions 1-4 and the last question in each set, and for the remaining questions we seek whether or not good information exists to answer these questions. We hope to receive this information by **July 31<sup>st</sup>**. Thank you for taking time to assist us with this project. If you have any questions please feel free to reach out to us. Any information that you may be able to provide will be helpful in our project. Sincerely,

Ana Pena-Molina  
703-308-8753

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